

Ira Spiro (Bar No. 67641)
10573 West Pico Blvd. #865
Los Angeles, California 90064
Telephone: 310-235-2350
e-mail: ira@spirolawcorp.com

Defendant, a Self-Represented Attorney

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TODD R.G. HILL,

Plaintiff,

vs.

THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW ET AL.,

Defendants.

Case No. CV23-1298-CV(BFM)

**CASE MANAGEMENT
STATEMENT**

Before
**Hon. Cynthia Valenzuela and
Hon. Magistrate Judge
Brianna Fuller Mircheff**

1 Pursuant to paragraph 12 of the Court’s order of February 6, 2025 (ECF 205),
2 given that Plaintiff is proceeding without counsel, Defendant Ira Spiro (sued as
3 Robert Ira Spiro) submits the following Separate Case Management Statement.

4 Presently the most important information about this case is in the Report and
5 Recommendation of Magistrate Judge Mircheff regarding disposition of the various
6 Defendants’ motions to dismiss the Second Amended Complaint pursuant to Federal
7 Rule of Civil Procedure 8, on the grounds that a host of pleading errors result in its
8 failure to state a claim. The Report reads:

9 “These errors [in the Second Amended Complaint] and others like them
10 prevent any given Defendant from understanding exactly what Plaintiff
11 alleges that Defendant did wrong. And ... the SAC does not do what the
12 District Judge instructed Plaintiff to do: “‘intelligently inform’ Defendants in
13 this action—and this Court—who violated his rights, what facts show that his
14 rights were violated, when the violations occurred, where they happened, and
15 why he is entitled to relief.” (See ECF 45 at 10.) ... **this Court is lost in a sea
16 of events, meetings, and emails, without a clear understanding of how
17 any of the allegations support Plaintiff’s claims.**”

18 “The Court therefore believes that it would be appropriate to give
19 Plaintiff **one last opportunity** to attempt to state a claim.”
20 (ECF 132, p. 14, lns. 12-21 and p.2, lns. 10-12, emph. added. This report was
21 adopted by District Judge Staton (ECF 145).)

22 Despite Judge Mircheff’s criticism of errors in the Second Amended
23 Complaint, **plaintiff filed at Third Amended Complaint (ECF 148) with
24 precisely the same types of errors.** Motions to dismiss the Third Amended
25 Complaint are pending.

26
27 In addition, Defendant Spiro answers the specific items in the Reassignment
28 Order of Judge Valenzuela (ECF 205) as follows:

a. The date the case was filed:

February 20, 2023

b. A list identifying or describing each party;

- The Board of Directors, Officers and Agents and Individuals of the Peoples College of Law
- The Guild Law School doing business as Peoples College of Law
- Hector C. Peña
- Christiana Marin Gonzalez
- Robert Ira Spiro [a.k.a. Ira Spiro]
- Juan Manuel Sarinana
- David Tyler Bouffard
- Joshua Gillens
- Clemente Franco,
- Hector Sanchez
- Pascual Torres
- Carol Deupree Gary [deceased]
- Gary Silbiger
- Edith Pomposo
- Adriana Zuniga Nunez
- Roger Aramayo
- William Maestas
- Ismael Venegas
- Louisa Ayrapetyan
- Natalie Leonard
- Leah Wilson
- Brandon N. Stallings
- Ruben Duran
- Hailyn Chen

- Audrey Ching
- Melanie M. Shelby
- Arnold Sowell, Jr.
- Mark W. Toney
- Paul A. Kramer
- Jean Krasilnikoff
- Ellin Davtyan
- George S. Cardona
- Devan Mcfarland
- Enrique Zuniga

c. A brief summary of all claims, counterclaims, crossclaims, or third party claims

There are no counterclaims, crossclaims, or third party claims. A brief summary of all claims in the most recent amended complaint, the Third Amended Complaint, cannot be done, for the reasons stated in the Report and Recommendation of Magistrate Judge Mircheff, which describes the Second Amended Complaint but is equally true of the Third Amended Complaint:

“[it] does not ... ‘intelligently inform’ Defendants in this action—and this Court—who violated his rights, what facts show that his rights were violated, when the violations occurred, where they happened, and why he is entitled to relief.”

(ECF 132, p. 14, lns. 15-18).

However, the first two pages of the Third Amended Complaint list the following purported causes of action:

- I. Equal Protection Violation Under The 14th Amendment
- II. Violation Of The Unruh Civil Rights Act (Cal. Civil Code § 51)
- III. Title VI of The Civil Rights Act of 1964 - Racial Discrimination In Education

1 IV. RICO - Damages Under Racketeer Influenced and Corrupt Organizations
2 Act
3 V. Conspiracy
4 VI. Negligence And Negligence Per Se
5 VII. Negligent Hiring, Retention, And Supervision
6 VIII. Violation of Title IX of the Education Amendments of 1972 (20 U.S.C.
7 § 1681)
8

9 **d. A brief description of the events underlying the action.**

10 This cannot be done either, for reasons stated in Report and Recommendation
11 of Magistrate Judge Mircheff quoted below in this paragraph. It describes the
12 Second Amended Complaint but is equally true of the Third Amended Complaint.
13 The Third Amended Complaint is 188 pages long including exhibits, which are
14 referred many times in it and to some extent expressly incorporated in it. Judge
15 Mircheff wrote: “this Court is lost in a sea of events, meetings, and emails, without a
16 clear understanding of how any of the allegations support Plaintiff’s claims. this
17 Court is lost in a sea of events, meetings, and emails, without a clear understanding
18 of how any of the allegations support Plaintiff’s claims. And each cause of action
19 contains lists of facts, many of which have no relation to the cause of action under
20 which they fall—making it impossible for the Court to test their legal sufficiency”
21 (ECF 132, p. 14, lns. 19-23.)
22

23 **e. A description of the relief sought and the damages claimed with an**
24 **explanation of how damages have been (or will be) computed**

25 A section of the Third Amended Complaint entitled “REMEDIES” probably
26 functions as a prayer, although it is several pages long. This Defendant believes it is
27 impossible to know how the damages have been or could be computed. This
28 “REMEDIES: section reads:

“REMEDIES

“260. Plaintiff re-alleges and incorporates by reference all prior allegations contained in ¶¶ 1-182, insofar as they establish the Defendants' liability and the Plaintiff's entitlement to the remedies sought herein.

261. Claims for damages against the State Bar and its employees in their official capacities are not pursued where Eleventh Amendment immunity applies. However, Plaintiff seeks injunctive relief against the State Bar employees in their individual capacities for actions taken outside the scope of their official duties under the Ex Parte Young exception, as it seeks prospective relief to remedy ongoing violations of federal law.

262. Todd did not receive an accurate transcript or degree and is owed money.

A. Monetary Relief:

263. Compensatory damages in an amount to be proven at trial against all Defendants, jointly and severally, for the harm caused by their conduct as described in the First through Eighth Causes of Action.

264. Treble damages, totaling \$750,000.00, as allowed by Civil Code section 52(a) against all Defendants, jointly and severally, for the harm caused by their conduct as described in the Seventh Cause of Action.

265. Punitive damages against all Defendants, jointly and severally, to punish them for their malicious and willful misconduct and to deter similar conduct in the future.

266. Plaintiff further seeks punitive damages against the individual defendants for their deliberate indifference to his rights under Title IX.

B. Declaratory Relief:

267. A declaration that the State Bar's "non-interference" policy is unlawful and violates the rights of students at unaccredited law schools.

1 268. A declaration that PCL's practices, as described in this Complaint,
2 violate the Unruh Civil Rights Act and the California Business and
3 Professions Code.

4 269. A declaration that the State Bar failed to adequately supervise
5 PCL's compliance with requirements and that their inaction and failure to
6 intervene after becoming aware of the retaliatory conduct constituted
7 violations of Plaintiff's rights based upon the findings.

8 C. Injunctive Relief:

9 270. The Plaintiff respectfully requests that the Court order the
10 Defendants to issue a public statement acknowledging their wrongdoing and
11 offering a sincere apology to the Plaintiff and all other students who have
12 been adversely affected by their actions and inactions. Such a statement
13 should explicitly recognize the harm caused by the Defendants' conduct and
14 express a commitment to rectifying the systemic issues that allowed such
15 harm to occur.

16 271. The Plaintiff further requests that the Court order the Defendants
17 to establish a restitution fund to compensate all students who have suffered
18 financial or other losses as a result of the Defendants' conduct. The fund
19 should be administered by an independent third party and provide adequate
20 compensation for tuition, fees, lost wages, and other damages incurred by the
21 affected students.

22 272. The Plaintiff urges the Court to mandate that the State Bar
23 implement comprehensive reforms to its accreditation and oversight processes
24 to prevent similar abuses from occurring in the future. These reforms should
25 include, but not be limited to, stricter standards for unaccredited law schools,
26 increased transparency and accountability in the accreditation process, and
27 enhanced enforcement mechanisms to address noncompliance.
28

1 273. The Plaintiff requests that the Court order the State Bar to
2 implement transparency and accountability measures to ensure public trust
3 and confidence in its regulatory functions. These measures should include
4 regular audits of its operations, public reporting of its regulatory activities,
5 and the establishment of an independent
6 ombudsman to address complaints and concerns from the public.

7 274. Plaintiff also seeks injunctive relief requiring PCL and the State
8 Bar to implement policies and training to prevent future violations of Title IV
9 and/or Title IX, including proper handling of complaints and retaliation.

10 275. A permanent injunction ordering the State Bar of California to:

11 i. Cease enforcing the "non-interference" policy.

12 ii. Implement and enforce regulations to ensure accurate record-keeping
13 at law schools.

14 iii. Take affirmative steps to address the disparity in bar passage rates
15 between accredited and unaccredited law schools.

16 276. A permanent injunction ordering PCL to: i. Cease all operations
17 and dissolve as a corporation under Corporations Code section § 6518.

18 ii. Refund all tuition and fees paid by Plaintiff and other similarly
19 situated students.

20 D. Other Relief:

21 i. An order directing PCL to provide Plaintiff with an accurate,
22 complete, and official transcript reflecting all coursework and grades earned,
23 and to confer upon Plaintiff a Juris Doctorate degree.

24 ii. An order directing the State Bar to investigate and take disciplinary
25 action against Defendants Leonard, Wilson, Chen, and Ching for their
26 misconduct.

27 E. Plaintiff also seeks the following remedies:
28

- i. Civil penalties under Business and Professions Code sections §§ 17206, 17206.1, and 17536 for violating the Business and Professions Code.
- ii. The permanent removal of Defendants under Corporations Code section § 5223 as the Court deems appropriate.
- iii. A declaration of Plaintiff's "good faith" indemnification.
- iv. Plaintiff's costs of suit and other costs under Government Code section § 12598.
- v. A statement of determination of PCL's Board Election Validity under California Corporations Code section § 5716.

f. The status of discovery, including any significant discovery management issues, as well the applicable cutoff dates

There has been no discovery, because the most recent amended complaint has not been answered (i.e. the case is not at issue) and there has been no order for a scheduling conference under F.R.C.P. Rules 16 and 26.

g. A procedural history of the case, including any previous motions that were decided or submitted, any ADR proceedings or settlement conferences that have been scheduled or concluded, and any appellate proceedings that are pending or concluded

On February 20, 2023, Plaintiff Todd R.G. Hill filed his initial Complaint. On April 5, 2023, the Court issued an order, on its own motion, dismissing the Complaint for violation of F.R.C.P. 8(a) and (d), with leave to amend.

On April 18, 2023, Plaintiff filed a First Amended Complaint (ECF 38).

On May 5, 2023, Plaintiff filed a document titled "A Motion for Leave to Supplement Todd R. G. Hill's First Amended Complaint" (ECF 40), attaching a proposed "Supplemental First Amended Complaint" (ECF 40-1).

1 On June 7, 2023, the Court issued an order (ECF 45) that denied Plaintiff's
2 motion to file a "Supplemental First Amended Complaint" and dismissed the First
3 Amended Complaint with leave to amend. The Court's reasons for dismissal are
4 essentially the same as those in the April 5, 2023 order dismissing the initial
5 Complaint.

6 By July 27, 2023, Plaintiff did not file a Second Amended Complaint within
7 the 21 days the Court allotted, or at all. Thus, on July 27, 2023, the Court issued a
8 Judgment of Dismissal (ECF 47) for failure to file a Second Amended complaint
9 within the 21 days.

10 Then, 92 days after the June 7 order giving Plaintiff 21 days to file a Second
11 Amended Complaint, Plaintiff did the following:

12 1. On September 7, 2023, Plaintiff filed a "Motion for Leave to File a
13 Third Amended Complaint and to Set Aside Judgment of Dismissal." (ECF 48)

14 2. On the same day, September 7, 2023, Plaintiff filed a Second Amended
15 Complaint, even though Plaintiff's Motion for Leave to File a Second Amended
16 complaint had not been granted or even ruled on, and the Judgment of Dismissal had
17 not been set aside.

18 On September 18, 2023, the Court issued an order (ECF 51) striking the
19 Second Amended complaint.

20 Later on September 18, 2023, the Court issued an order (ECF 54) granting
21 Plaintiff's motion to set aside the dismissal and ordering Plaintiff to file any
22 amended complaint within 14 days of the order.

23 Two days later, on September 20, 2023, Plaintiff filed the same Second
24 Amended Complaint (ECF 148) he had improperly filed on September 7.

25 On September 28, 2023, Defendant Spiro filed his motion to dismiss the
26 second amended complaint and the entire action.

27 On October 16, 2023, the Court issued a minute order assigning this case to
28 Magistrate Judge Mircheff.

1 On April 23, 2024, the Interim Report and Recommendation of Magistrate
2 Judge Mircheff was filed (ECF 132), analyzing the issues on the motion to dismiss
3 the Second Amended Complaint and recommending a disposition.

4 On August 5, 2024, the Court issued an order (ECF 145), adopting the
5 Magistrate Judge's Report and Recommendations, granting Defendant Spiro's
6 request to dismiss the Second Amended Complaint, with leave to file a "Third
7 Amended Complaint remedying the deficiencies detailed herein." (Emph. added.)

8 Plaintiff filed a Third Amended Complaint. It was served on Defendants by
9 the Court's Notice of Electronic Filing (NEF) on August 26, 2024, although it bears
10 a file stamp of August 21, 2024.

11 All Defendants filed motions to dismiss the Third Amended Complaint.
12 Those motions have been fully briefed since late December, 2024. The Court has
13 not yet ruled on them, tentatively or finally.

14
15 **h. A description of any other deadlines in place before reassignment**

16 There were no deadlines in place immediately before reassignment.

17 **i. Whether the parties will consent to a magistrate judge for trial**

18 At this point Defendant Spiro does not consent to a magistrate judge for trial,
19 and he does not know whether Plaintiff or the other Defendants will consent.

20
21 **j. A statement from each parties' counsel indicating they have**

22 **(1) discussed the magistrate judge consent program with their**
23 **respective client(s), and**

24 **(2) met and conferred to discuss the consent program and selection**
25 **of a magistrate judge and**

26 **k. Whether there is an immediate need for a scheduling conference and,**
27 **if so why the parties believe such a need exists.**

1 Defendant Spiro is an attorney, but he is representing himself. He has met and
2 conferred with Plaintiff by email about consent to the magistrate judge consent
3 program, stating that he does not presently consent to the program.

4 Dated: February 8, 2025

/s/

5 Ira Spiro
6 Defendant, a Self-Represented Attorney
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I reside in the State of California, County of Los Angeles. I am over the age of 18 and not a party to this lawsuit. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On the date set forth below, I served the document described as CASE MANAGEMENT STATEMENT on the interested parties in this action by placing: ☐ the original ☒ true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

Todd R. G. Hill
41459 Almond Avenue
Quartz Hill, Ca 93551

☐ **BY MAIL:** I deposited the envelope(s), with postage prepaid, in the United States Mail (United States Postal Service) at Los Angeles, California.

☒ **BY MAIL PER BUSINESS PRACTICES:** I placed the document(s) in a sealed envelope for collection and mailing following ordinary business practices. I am readily familiar with this business' practice for collection and processing of correspondence for mailing with the U.S. Postal Service, Under that practice, the envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

☐ **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted the document(s) listed above on the parties listed herein at their most recent known e-mail address(s) or e-mail of record in this action before 6:00 p.m. I hereby certify that this document was served from Los Angeles, California.

☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

☐ **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed February 8, 2025 at Los Angeles, California.

Ira Spiro

Type or Print Name

/s/

Signature